

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE**

Nashville Division

CONCORD MUSIC GROUP, INC., et al.

Case No. 3:23-cv-01092

v.

ANTHROPIC PBC

Judge Waverly D. Crenshaw, Jr.

**MOTION FOR ADMISSION *PRO HAC VICE***

Pursuant to Rule 83.01 of the Local Rules of Court for the United States District Court Middle District of Tennessee, Nicole Saad Bembridge hereby moves for admission to appear *pro hac vice* in the above-captioned action as counsel for amici curiae Chamber of Progress & NetChoice.

Pursuant to 29 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct:

1. I am a member in good standing of the United States District Court for the Western District of Washington. Attached is a Certificate of Good Standing from that court.

2. I am not, nor have I ever been, the subject of disciplinary proceedings by any disciplinary authority, court, or tribunal, except as provided below:

N/A

3. I have not been found in contempt by any court or tribunal, except as provided below:

N/A

4. I have not been sanctioned pursuant to 28 U.S.C. § 1927, except as provided below:

N/A

5. I have never been censured, suspended, disbarred, or denied admission or readmission by any court or tribunal, except as provided below.

N/A

6. I have not been charged, arrested, or convicted of a criminal offense or offenses, except as provided below:

N/A

7. I understand that pursuant to Local Rule 83.01(d)(1), if I am not both a member of the Tennessee bar and admitted to the bar of this Court, local counsel must be retained. Below is the name, address, phone number, and e-mail address of local counsel retained in this matter:

Kevin C. Klein  
1332 4th Avenue North, Nashville, Tennessee 37208  
(615) 600-4780  
kevin.klein@kleinpllc.com

8. I have read and am familiar with Local Rules of Court for the United States District Court Middle District of Tennessee.

9. By seeking admission to practice before this Court, I acknowledge my responsibility for compliance with all rules of this Court and confer disciplinary jurisdiction upon this Court for any alleged misconduct arising in the course of the proceeding.

/s/ Nicole Saad Bembridge Signature

Name: Nicole Saad Bembridge

State where admitted and State Bar Number: Washington, D.C. 1767634

Business Address: 1401 K St NW, Suite 502 Washington, D.C. 20005

Local Address [if different from above]:

Phone: (443) 254-6330

Email: nsaadbembridge@netchoice.org

**CERTIFICATE OF SERVICE**

[Include certificate of service in compliance with Local Rule 5.01 and 5.02]

See attached.

**\*\*FEE: \$150.00** [Fee may be paid through the credit card module in ECF or payment may be forwarded to the Clerk within 21 days of filing the motion. If forwarded to the Clerk, payment should be in the form of a check, cashier's check or money order payable to the Clerk, U.S. District Court, 719 Church Street, Suite 1300, Nashville, TN 37203.]

**CERTIFICATE OF SERVICE**

I certify that I filed the foregoing Motion for Admission Pro Hac Vice on the Court's CM/ECF system on this 19th day of January, 2024, which forwarded a copy to:

Andrew Guerra  
Oppenheim & Zebrak, LLP (NY)  
461 5th Avenue, 19th Floor  
New York, NY 10017  
(212) 951-1156  
Email: andrew@oandzlaw.com

Audrey Adu-Appiah  
Oppenheim & Zebrak, LLP  
4530 Wisconsin Ave. NW  
5th Floor  
Washington, DC 20016  
(202) 480-2999  
Email: aadu-appiah@oandzlaw.com

Jennifer Pariser  
Oppenheim & Zebrak, LLP (NY)  
461 5th Avenue, 19th Floor  
New York, NY 10017  
(212) 951-1156  
Email: jpariser@oandzlaw.com

Jonathan Z. King  
Cowan, Liebowitz & Latman, P.C.  
114 West 47th Street  
Suite 2100  
New York, NY 10036  
(212) 790-9200  
Fax: (212) 575-0671  
Email: jzk@cll.com

Matthew J. Oppenheim  
Oppenheim & Zebrak, LLP  
4530 Wisconsin Ave. NW  
5th Floor  
Washington, DC 20016  
(202) 480-2999  
Email: matt@oandzlaw.com

Nicholas C. Hailey  
Oppenheim & Zebrak, LLP  
4530 Wisconsin Ave. NW  
5th Floor  
Washington, DC 20016

(202) 480-2999  
Email: [nick@oandzlaw.com](mailto:nick@oandzlaw.com)

Richard Dannay  
Cowan, Liebowitz & Latman, P.C.  
114 West 47th Street  
Suite 2100  
New York, NY 10036  
(212) 790-9200  
Email: [rxl@cll.com](mailto:rxl@cll.com)

Richard S. Mandel  
Cowan, Liebowitz & Latman, P.C.  
114 West 47th Street  
Suite 2100  
New York, NY 10036  
(212) 790-9291  
Fax: (212) 575-0671  
Email: [rsm@cll.com](mailto:rsm@cll.com)

Steven Allen Riley  
Riley & Jacobson, PLC  
1906 West End Avenue  
Nashville, TN 37203  
615-320-3700  
Email: [sriley@rjfirm.com](mailto:sriley@rjfirm.com)

Timothy Seungmin Chung  
Oppenheim & Zebrak, LLP (NY)  
461 5th Avenue, 19th Floor  
New York, NY 10017  
440-985-8308  
Email: [tchung@oandzlaw.com](mailto:tchung@oandzlaw.com)

Timothy G. Harvey  
Riley & Jacobson, PLC  
1906 West End Avenue  
Nashville, TN 37203  
615-320-3700  
Email: [tharvey@rjfirm.com](mailto:tharvey@rjfirm.com)

*Attorneys for Plaintiffs*

Aubrey B. Harwell III (No. 017394)  
Nathan C. Sanders (No. 033520)  
Olivia Rose Arboneaux (No. 040225)  
Neal & Harwell, PLC  
1201 Demonbreun Street, Suite 1000  
Nashville, TN 37203

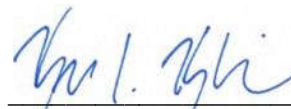
Telephone: (615) 244-1713  
trey@nealharwell.com  
nsanders@nealharwell.com  
oarbonateaux@nealharwell.com

Joseph R. Wetzel (admitted pro hac vice)  
Andrew M. Gass (admitted pro hac vice)  
LATHAM & WATKINS LLP  
505 Montgomery Street, Suite 2000  
San Francisco, CA 94111  
Telephone: (415) 391-0600  
joe.wetzel@lw.com  
andrew.gass@lw.com

Allison L. Stillman (admitted pro hac vice)  
LATHAM & WATKINS LLP  
1271 Avenue of the Americas  
New York, NY 10020-1345  
Telephone: (212) 906-1200  
alli.stillman@lw.com

Sarang V. Damle (admitted pro hac vice)  
LATHAM & WATKINS LLP  
555 Eleventh Street NW, Suite 1000  
Washington, D.C. 20004  
Telephone: (202) 637-2200  
sy.damle@lw.com

*Attorneys for Defendant*

  
Kevin C. Klein